

**Before the
Federal Communications Commission
Washington DC 20554**

)	
Request for Waiver of Missed Deadlines)	
Missed Deadline for filing appeal)	FCC Form 471# 1041188
Missed Invoice Inquiry Deadline)	FRN 2858110
Missed Contract Extension (FCC Form 500) Request Deadline)	
 School District, Denali Borough)	
)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

Request for Waiver of 4 FCC deadlines

In accordance with Sections 54.719 through 54.721 of the Commission's Rules, Denali Borough School District in Healy, Alaska requests Federal Communications Commission (Commission) waiver of the March 20, 2017 deadline for submission of a USAC appeal of a zero funded FCC Form 472 (BEAR). We respectfully request that the Commission waive the certification deadline for this application and remand the invoice to USAC for further processing.

Denali Borough School District
Billed Entity Number: 145642
Form 471 Application Number: 1041188
FRN # 2858110

Background:

The Denali Borough School District requested and received funding for Internal Connections as the result of FY15 FCC FRN # 2858110. The contract end date was listed as August 15, 2015 and the Denali Borough School District was in possession of a signed contract (see Appendix A). The Delivery of the Internal Connections was delayed beyond the contract end date due to Funding Commitment Decision Letter (FCDL) result. The Denali Borough School District was

waiting on the decision whether the purchase of the equipment will be funded or not. In the meantime, the individual who was handling the E-rate paperwork should have filed an extension prior to the end of the contract. The contract extension was not filed properly and not within the proper timeframe/deadline.

The actual delivery of FRN 2858110 equipment was on January 08, 2016 to the Denali Borough School District. An invoice was originally submitted to USAC via FCC Form 472 (see Appendix B) on October 2016 for reimbursement. On December 2016, Denali Borough School District received a Form 472 notification letter from USAC notifying us that the request has been denied due to "Service Delivered after Contract Expiration".

The Denali Borough School District submitted an appeal to USAC on January 4, 2017 and provided a paper form FCC Form 500 (see Appendix C) and signed contract amendment (see Appendix D) from GCI (service provider) dated November 29, 2016. This was returned to the district with instruction that USAC Form 500 rules had changed and this Form 500 now needed to be submitted into the EPC portal.

On January 20, 2017, Denali Borough School District received a Rejection for Non-receipt of Requested Information Funding Year 18 (2015-2016) FCC Form COR. In response, the Denali Borough School District submitted an appeal on February 8, 2017 and have provided the necessary document that we believe will support our request. On March 6, 2017, Denali Borough School District received another Administrator's Decision on Appeal for Funding Year 2015-2016 as "Denied". Denali Borough School District contacted SLD Invoicing office and was advised to submit a new FCC Form 500 electronically to change the Contract Expiration Date from August 15, 2015 to February 29, 2016. On March 9, 2017, Denali Borough School District submitted FCC Form 500 via USAC online submission which included a copy of Form 472 electronically signed on October 19, 2016 and a copy of GCI quote amendment 176-1. On April 10, 2017, Denali Borough School District received Form 500 Notification Letter stating that the Contract Expiration Date has changed to 2/29/2016. Then On April 13, 2017, Denali Borough School District received a Remittance Statement notice that shows a Total Approved Disbursement amount of zero with an explanation of "Invoice Received Date Later than Invoice Acceptable End Date.

Discussion:

The Denali Borough School District would like to Request for Waiver for the following items

1. **Appeal Deadline:** The first denial letter was dated and issued on December 14, 2016 after Denali Borough School District submitted BEAR Form 472 with the necessary documents for the reimbursement request. We had a 60 day window with which to appeal. After we received the first denial letter, we did not waste any time and have submitted an appeal on January 4, 2017 to provide all the documents that we believe will support our request for reimbursements. Back then, Denali Borough School District also submitted FCC Form 500 in paper form. We received another denial letter on January 20, 2017 and submitted another appeal on February 8, 2017. Our request was denied again for the third time on March 6, 2017. Denali Borough School District was not fully aware that the said Form should be completed and submitted electronically prior to the contract expiration. The electronic version of Form 500 was finally submitted electronically on March 9, 2017 with the assistance of Ms. Valerie Oliver, State of Alaska E-Rate Coordinator for Schools and Libraries. We have consistently tried to find ways to resolve the issues and we have come to realize the severity and the huge impact of the current situation to the District.
2. **Invoice Deadline:** Our invoice deadline was on January 30, 2017. Denali Borough School District originally submitted our invoice through BEAR Form 472 on October 19, 2016 for reimbursement. Denali Borough School District was in the middle of submitting appeals and documentation for FRN 2858110 and at the same time the pressure of the transition was taking place on who will handle the E-rate tasks due to the frequent absence of the individual. As a result, we have neglected to pay attention to the deadline of the said invoice submission.
3. **15 Day Response Deadline (to PIA during BEAR invoicing):** Denali Borough School District has the contract amendment from our service provider on November 29, 2016 signed by both GCI and Denali Borough School District authorized representatives. During this time, the individual who was handling and processing E-Rate documents and application was in and out of the office due to personal issues. There was a lack of time

for training on our part during the transition time. Due to the circumstance, we have missed important submissions and deadlines.

4. Contract Extension Deadline: Denali Borough School District and GCI signed contract agreement ended on August 15, 2015. An amendment was issued by GCI on November 29, 2016 to extend the contract from August 15, 2015 to February 29, 2016. Due to funding availability, Denali Borough School District did not submit contract extension until we received a notification through Funding Commitment Decision Letter that we have funds to acquire the equipment. Since the individual who was processing E-rate is no longer with the District, we are uncertain as to why Form 500 was not filed to extend the contract prior to expiration during this period on behalf of the District. Denali Borough School District believes that rules and regulations are set to be followed and we are aware that we have missed a lot of opportunities due to our mishaps and we are eager to correct faults and errors and move on with the best resources available.

Conclusion:

The Denali Borough School District is in dire need of reimbursement for the purchased equipment and recognizes that mistakes were made by the district. During the transition from our former lead E-rate individual to the time when I took over duties for E-rate, there was a period where the District did not have a clear understanding of the timeline or program rules that govern deadlines. We ask for your leniency in the issue of the above mentioned deadlines and respectfully request that you remand FRN 2858110 to USAC so that it may be processed in invoicing.

The Denali Borough School District

Respectfully Submitted by


Czarina Voivedich
Business Manager
PO Box 280
Healy, AK 99743

APPENDIX A



Quote

Quote Number: 176

Payment Terms:
Expiration Date: 08/15/2015

Quote Prepared For

Jim Smola
Denali Borough School District (DBSD)
P.O. Box 280
Healy, AK 99743
Phone: (907) 683-2279
jimsmola@dbbsd.org

Quote Prepared By

Audra Cook
GCI
401 E. Fireweed Lane, Suite 201
Anchorage, AK 99503
United States
Phone: (907) 433-7210
Fax:
acook@gci.com

ITEM#	QUANTITY	ITEM NAME	UNIT PRICE	UNIT DISCOUNT	ADJUSTED UNIT PRICE	EXTENDED PRICE
One-Time Items						
1)	3	L-LIC-CT5508-5A 5 AP Adder License for the 5508 Controller(eDelivery)	\$1,619.26	\$0.00	\$1,619.26	\$4,857.77
2)	28	AIR-CAP2702I-A-K9 802.11ac CAP w/CleanAir; 3x4:3SS; Int Ant; A Reg Domain	\$710.66	\$0.01	\$710.66	\$19,898.34
3)	4	SMX2000RMLV2U UPS	\$1,386.34	\$0.00	\$1,386.34	\$5,545.36
4)	2	SMX120RMBP2U UPS	\$819.08	\$0.00	\$819.08	\$1,638.16
					One-Time Total	\$31,939.63
Shipping Items						
5)	1	Shipping Shipping Estimate	\$500.00	\$0.00	\$500.00	\$500.00
					Shipping Total	\$500.00
Comment:			In response to form 470 application 592490001334115.		Subtotal	\$32,439.63
					Total Taxes	\$0.00
					Total	\$32,439.63

Optional Items

ITEM#	QUANTITY	ITEM NAME	UNIT PRICE	UNIT DISCOUNT	ADJUSTED UNIT PRICE	EXTENDED PRICE
6)	30	Patch Cables Optional Patch Cables - 7ft Cat5e	\$7.00	\$0.00	\$7.00	\$210.00
7)	3	CON-SNT-LICCT55A SMARTNET 8X5XNBD 5 AP Adder License (1 Year)	\$281.56	\$0.00	\$281.56	\$844.68
8)	28	CON-SNT-AIRCIK9 SMARTNET 8X5XNBD 802.11ac CAP w/Clean (1 Year)	\$38.24	\$0.00	\$38.24	\$1,070.72
Optional Total						\$2,125.40

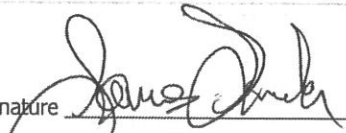
Including Optional Quote Items

Subtotal \$34,565.03

Total Taxes \$0.00

Total \$34,565.03

Authorizing Signature


Date 4-16-2015

Payment terms are NET 30 from date of invoice. Any labor or materials outside the scope of work agreement or maintenance agreements will be billed at GCI T&M rates. All information in this document (including prices, sketches, drawings, line itemizations, design information, and accompanying proposals) other than general information obvious to be in the public domain is considered by GCI to be proprietary.

FCC Form 472

Do not write in this space.

Approved by OMB
OMB Control No. 3060 - 0856
Estimated time per Response: 1.0
hours

Universal Service for Schools and Libraries

Please read instructions
before completing.

(To be completed by schools,
libraries, or consortia.)

BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Only one Service Provider Identification Number (SPIN) per form.

Must be completed and signed by the Billed Entity Applicant.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Applicant Form Identifier (Create an identifier for your own reference) FRN: 2858110	FCC Form 472 Invoice # (To be inserted by administrator) 2443350
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BLOCK 1: HEADER INFORMATION

1. Billed Entity Name	Denali Borough School District
2. Billed Entity Number	145642
3. Service Provider Identification Number (SPIN)	143001199
Applicant FCC Form 498 ID	443016438

4. Contact Name	Czarina S. Voivedich
5. Contact Telephone Number	907- 6832278 ext 5015
6. Total Reimbursement Amount (total from Block 2, Column 14)	\$19,163.78

Page 1 of 3

FCC Form 472

July 2016

Approved by OMB
OMB Control No.3060 - 0856
Estimated time per Response: 1.0 hours

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name Denali Borough School District Billed Entity Number 145642
Contact Name Czarina S. Voivedich Contact Telephone Number 907-68322785015
Applicant Form Identifier FRN: 2858110

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
	FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service	Discount Rate	Amount Billed to USAC (Column 12 multiplied by Column 13)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (10) or Column (11), but not both Columns				
1	1041188	2858110		2/12/2016		\$32,439.78	60.00	\$19,163.78
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)								\$19,163.78

Approved by OMB
OMB Control No.3060 - 0856
Estimated time per Response: 1.0 hours

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name Denali Borough School District

Billed Entity Number 145642

Contact Name Czarina S. Voivedich

Applicant Form Identifier FRN: 2858110

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in this Billed Entity Applicant Reimbursement Form represent charges for eligible services and/or equipment delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- B. The discount amounts listed in this Billed Entity Applicant Reimbursement Form were already billed by the Service Provider and paid for by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in this Billed Entity Applicant Reimbursement Form are for eligible services and/or equipment approved by the Fund Administrator pursuant to a Funding Commitment Decision Letter (FCDL).
- D. I acknowledge that I may be audited pursuant to this application and will retain for at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records that I rely upon to complete this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person **Signed electronically by Czarina S. Voivedich**

16. Date **10/19/2016**

17. Printed name of authorized person **Czarina S. Voivedich**

18. Title or position of authorized person **Business Manager**

19. Telephone number of authorized person **907- 6832278 ext 5015**

20. Address of authorized person **PO Box 280, Healy AK 99743**

OMB Control No. 3060-0853

OMB Control No. 3060-0853
Estimated time per response:
1.5 hours

FCC Form 500
DO NOT STAPLE

Do Not Write In This Area

Universal Service for Schools and Libraries Funding Commitment Adjustment Request Form

Please read instructions before completing.

(To be completed by schools, libraries or consortia.)

Applicant's Form Identifier: 500145642
(Create your own code to identify THIS FCC Form 500)

FCC Form 500 Application Number:
(To be assigned by administrator.)

Block 1: Applicant Information

1. Name of Billed Entity <u>DENALI BOROUGH SCHOOL DISTRICT</u>	2. Billed Entity Number <u>145642</u>	3. Funding Year <u>2015</u>
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4. Complete Mailing Address of Billed Entity			
Street Address, P. O. Box or Route Number <u>P.O. BOX 280</u>	City <u>HEALY</u>	State <u>AK</u>	Zip Code <u>99743</u>

Telephone Number <u>907-683-2278</u>	Fax Number <u>907-683-2514</u>	Email Address <u>reenavoivedich@dbbsd.org</u>
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5. Contact Person Information			
Contact Person Name <u>CZARINA S. VOIVEDICH</u>			

Mailing Address			
Street Address, P. O. Box or Route Number <u>P.O. BOX 280</u>	City <u>HEALY</u>	State <u>AK</u>	Zip Code <u>99743</u>
Telephone Number	Fax Number	Email Address	

<u>907-683-2278</u>	<u>907-683-2514</u>	<u>reenavoivedich@dbbsd.org</u>
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Type of Adjustment (Check all that apply)

☒ Block 2: Services Adjustment

☐ Block 4: Equipment Transfer Notification

☐ Block 3: Cancellation or Reduction of an FRN

DO NOT STAPLE

Billed Entity Name DENALI BORDUEH SCHOOL DISTRICT Contact Name CZARINA S. VOIVODICHBilled Entity Number 145642 Contact Telephone Number 907-683-2278 Page 2

Block 2: Services Adjustment

Remember: The Funding Request Number(s) (FRNs) listed on this form must be for the same Funding Year as listed in Block 1, Item 3.

New Service Start Date: Complete if you wish to change the Service Start Date you listed on a previously filed FCC Form 486 in the funding year listed in Block 1, Item 3. This action will NOT increase funding.

Contract Expiration Date: Complete if the contract expiration date has changed and you wish to report the change to USAC. This action will NOT increase funding but you could combine it with a funding reduction.

Service Delivery Extension: Complete if you are requesting an extension of the deadline for delivery and installation of non-recurring services. You must submit this request to USAC on or before the September 30 following the close of the funding year. This action will NOT increase funding. **Note:** Complete the Contract Expiration Date (Item 7) also if your contract will expire prior to the installation or delivery of services.

6. Service Start Date

FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy)	New Date (mm/dd/yyyy)

7. Contract Expiration Date

FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy)	New Date (mm/dd/yyyy)
1041188	2858110	02/15/2015	02/29/2016

Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 2A, 2B, 2C, etc. and provide the number in space provided in Block 2.

8. Service Delivery Extension Request

FCC Form 471 <u>1041188</u>	FRN <u>2858110</u>
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Certify the reason for the service delivery and installation request by checking one of the boxes below:

- ☒ The service provider was unable to complete delivery and installation for reasons beyond the service provider's control.
- ☐ The service provider has been unwilling to complete delivery and installation after USAC withheld payment for those services on a properly-submitted invoice for more than 60 days after submission of the invoice.

DO NOT STAPLE

Billed Entity Name DENALI BOROUGH SCHOOL DISTRICT Contact Name CZARINA S. VOIVODICHBilled Entity Number 145642 Contact Telephone Number 907-683-2278 Page 3**Block 3: Cancellation or Reduction of an FRN****Remember:** The FRNs listed on this form must be for the same Funding Year as listed in Block 1, Item 3.**Cancel:** Complete if you wish to cancel an FRN. This action is irrevocable and the FRN cannot be reinstated later. This action would allow money to be put back into the Universal Service Fund for possible commitment to other applicants.**Reduce:** Complete if you wish to reduce the amount of your funding commitment for a particular FRN. This action is irrevocable and the FRN cannot be increased later. This action would allow money to be put back into the Universal Service Fund for possible commitment to other applicants.**Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 3A, 3B, 3C, etc. and provide the number in space provided in Block 3****9. Cancel FRN**

FCC Form 471	FRN (s) (list individually)	Write in "CANCEL ALL" below if you wish to cancel all FRNs on FCC Form 471
N/A	N/A	N/A

10. Reduce FRN

FCC Form 471	FRN(s)	Original Commitment Amount from FCDL	New Commitment Amount AFTER Reduction
N/A	N/A	N/A	N/A

DO NOT STAPLE

Billed Entity Name DENALI BOROUGH SCHOOL DISTRICT Contact Name CZARINA S. VOIVEDICHBilled Entity Number 145642 Contact Telephone Number 907-683-2278

Page 4

Block 4: Equipment Transfer Notification

Remember: The FRNs listed on this form must be for the same Funding Year as listed in Block 1, Item 3.

11. **Equipment Transfer:** Complete this section if you are transferring equipment from a closed entity to other eligible entities within three years of the date of purchase. Both the transferring and receiving entities must maintain detailed records documenting the transfer and the reason for the transfer for at least five years (or whatever retention period is required by the rules in effect at the time of this certification).

Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 4A, 4B, 4C, etc. and provide the number in space provided in Block 4

FCC Form 471 <u>N/A</u>		FRN <u>N/A</u>
Closed Entity Number <u>N/A</u>		Closed Entity Name <u>N/A</u>
Purchase Date <u>N/A</u>	Transfer Date <u>N/A</u>	Transfer Reason <u>N/A</u>
<input type="checkbox"/> Check here if transfer is temporary. Enter projected return date _____		
List all entities receiving the equipment. Receiving Entity(s) Number(s)	Receiving Entity Name (s)	Equipment Received Equipment name, make and model
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

DO NOT STAPLEBilled Entity Name DENALI BOROUGH SCHOOL DISTRICT Contact Name CZARINA S. VOIVEDICHBilled Entity Number 145642 Contact Telephone Number 907-683-2278**Block 5: Certification**

12. I certify that I am authorized to submit this form on behalf of the above-named billed entity, that I have examined this request, and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.
13. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services.
14. I will retain for at least five years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of delivery of discount services (or after the date of transfer for equipment transfers), (1) any and all records that I rely upon to complete this form and (2) all documents necessary to demonstrate compliance with the statutory or regulatory requirements for the schools and libraries universal service support program. I recognize that I may be audited pursuant to this application and the applicant must produce such records as required by 47 C.F.R. § 54.516.

15. Signature

Czarina S. Voivedich

16. Date

01/4/2017

17. Printed name of authorized person

CZARINA S. VOIVEDICH

18. Title or position of authorized person

BUSINESS MANAGER

19. Telephone number of authorized person

907-683-2278

20. Email address of authorized person

reenavoivedich@dbisd.org

21. Address of authorized person

P.O. Box 280, HEALY, AK 99743

22. Name of Authorized Person's Employer

DENALI BOROUGH SCHOOL DISTRICT

GCI Communication Corp.
USAC SPIN 143001199
FCCRN 0001-5688-80

2550 Denali Street, Suite 1000
Anchorage, Alaska 99503
907-868-5600



GCI Education Amendment Quote 176-1

This is an Amendment subject to the terms and conditions of Quote 176 dated April 16, 2015 ("Agreement") between GCI Communication Corp. ("GCI") and Denali Borough School District ("Customer") (each a "Party" and collectively, "the Parties"). This Amendment memorializes the extension of the quote expiration date from August 15, 2015 to February 29, 2016. Except as expressly modified in this Amendment, the parties hereby confirm that all other terms remain in full force and effect.

Denali Borough School District



Authorized Customer Signature

DAN POLTA / SUPERINTENDENT

Printed Name and Title

29 Nov 2016

Amendment Date

GCI Communication Corp.



Authorized GCI Signature

Martin Cary Sr. VP and General Manager

Printed Name and Title

11-29-2016

Date Signed